

REMARKS

Claims 49-81 were pending in the application. Claims 49, 51-52, 60, 62-63, 71, and 73-74 have been amended. Claims 50, 61, and 72 have been cancelled. Accordingly, claims 49, 51-60, 62-71, and 73-81 remain pending in the application. Reconsideration is respectfully requested in view of the amendments to the claims and the following remarks.

I. The § 112 Rejections

Claims 49-81 stand rejected under 35 U.S.C. § 112, first paragraph, as containing subject matter which was not described in the specification in such a way to convey to one of skill in the art (at the time the application was filed) that Applicant had possession of the claimed invention. In particular, the Examiner asserts that there is no support in the specification showing that the metadata utilized to process the query was not stored on the second computer system *prior to* the second computer system receiving the request to process the query.

Applicant respectfully disagrees. Support for the language underlined above can be found in the specification at page 5, line 20 – page 6, line 5. In this cited portion of the specification, a client machine 202 (first computer system) submits a query to a server machine 206 (second computer system). If the data and metadata reside on the client machine 202, the query preferably *includes* data and metadata 204, along with a request for the server machine 206 to perform an operation on the data and metadata 204. Thus, in one implementation of the present invention, the metadata and data 204 are not stored on the server machine 206 *prior to* the server machine receiving the query. See MPEP 2163.02 – “The subject matter of the claims need not be described literally (i.e., using the

same terms or in *haec verba*) in order for the disclosure to satisfy the written description requirement.” Applicant, therefore, respectfully requests withdrawal of the § 112 rejections to the claims.

II. The § 102 Rejections

Claims 49-81 were rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 5,987,463 (“Draaijer”).

Applicant respectfully traverses the rejection.

Claim 49, as amended, recites a second computer system processing a query including performing an operation on data and metadata to generate a result for the query, in which the data and the metadata were not stored on the second computer system prior to the second computer system receiving the request to process the query.

A. Draaijer Fails To Disclose Processing, at a Second Computer System, a Query Including Performing an Operation on Data and Metadata to Generate a Result for the Query, in which the Data and the Metadata Were Not Stored on the Second Computer System Prior to the Second Computer System Receiving the Request to Process the Query

Draaijer discloses a local database server that includes a heterogeneous services module to selectively send requests to foreign processes based on the capabilities of the foreign processes (see Abstract). More specifically, referring to FIG. 2A, Draaijer discloses an architecture for a database server process that includes a heterogeneous services module 311. In operation, a client process 200 supplies a SQL statement to a local server 202. The local server 202 performs conventional query processing when

processing native requests for data directly accessible by the local server 202 – e.g., data stored in local database 306 (col. 4, ll. 31-40).

The SQL statement sent by the client 202 may also require an operation to be performed by a foreign process, such as foreign database server 208. For example, the client statement may request data from a foreign database 308 under the control of the foreign database server 208 (col. 4, ll. 44-49). In such a case, the heterogeneous services module 311 is configured to map a particular database operation to a target foreign process based upon metadata definitions for the heterogeneous services stored within a data dictionary 220 (col. 6, ll. 59-64). The data dictionary 220 stores metadata definitions for mapping a database operation to a foreign process (col. 6, ll. 59-64). The data dictionary 220 further includes metadata that is not relevant to the local server 202, but which is necessary (and passed to) an agent process 300 of a foreign database server 208 for the foreign database server 208 to perform a database operation.

Draaijer, however, fails to disclose a second computer system processing the query including performing the operation on the data and the metadata to generate a result for the query, in which the metadata utilized to process the query was not stored on the second computer system prior to the second computer system receiving the request to process the query (emphasis added).

From the Perspective of the Local Server 202

From the perspective of the local server 202, when a client process 200 supplies statement to the local server 202, the local server performs conventional query processing when processing native requests for data directly accessible by the local server 202 (e.g.,

data stored in a local database 306). Accordingly, in this transaction, all the data and the metadata required to process the query is stored on the local server 202.

In a transaction in which the local server 202 requires data from a foreign database server 208, the local server 202 utilizes the data dictionary 220 (which stores metadata definitions for mapping a database operation to a foreign process). The data dictionary 200 is, however, stored in the local database 306. Thus, in this transaction, while the data is not stored on the local server 202 (i.e., it is stored on the foreign database server 208), the metadata required to process the transaction is stored on the local server 202.

From the Perspective of the Foreign Database Server 208

In the transaction above in which the local server 202 requires data from a foreign database server 208, the data dictionary 220 (stored at the local server 202) includes metadata that is relevant for processing of the transaction at the foreign database server 208. Thus, in a transaction in which the foreign database server 208 retrieves data to be sent to the local server 202, while the metadata may not be stored on the foreign database server 208, the data being returned to the local server 202 is stored on the foreign database server 208.

Consequently, Draaijer fails to disclose a second computer system processing a query including performing an operation on data and metadata to generate a result for the query, in which the data and the metadata were not stored on the second computer system prior to the second computer system receiving the request to process the query, as required by claim 49.

Applicant respectfully submits that claim 49 (and the claims that depend therefrom), therefore, should be allowable over Draaijer.

B. Other Independent Claims

Claims 60 and 71 each incorporates limitations similar to those of claim 49. Claims 60 and 71, and the claims that depend therefrom, are also allowable over Draaijer for reasons corresponding to those set forth with respect to claim 49.

Applicant respectfully submits that claims 49-81 are allowable over the reference cited above, and are in condition for allowance. Should any unresolved issues remain, the Examiner is invited to call the undersigned at the telephone number indicated below.

Respectfully submitted,
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